

Section 1. Registration Information

Source Identification

Facility Name: Daisy Brand, LLC
Parent Company #1 Name:
Parent Company #2 Name:

Submission and Acceptance

Submission Type: First-time submission
Subsequent RMP Submission Reason:
Description:
Receipt Date: 02-Mar-2010
Postmark Date: 02-Mar-2010
Next Due Date: 02-Mar-2015
Completeness Check Date: 02-Mar-2010
Complete RMP: Yes
De-Registration / Closed Reason:
De-Registration / Closed Reason Other Text:
De-Registered / Closed Date:
De-Registered / Closed Effective Date:
Certification Received: Yes

Facility Identification

EPA Facility Identifier: 1000 0021 0693
Other EPA Systems Facility ID:

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:
Parent Company #1 DUNS:
Parent Company #2 DUNS:

Facility Location Address

Street 1: 752 West Ash Avenue
Street 2:
City: Casa Grande
State: ARIZONA
ZIP: 85222
ZIP4:
County: PINAL

Facility Latitude and Longitude

Latitude (decimal): 32.873889
Longitude (decimal): -111.768056
Lat/Long Method: Global Positioning System (GPS) Carrier Phase
Static Relative Positioning Technique
Lat/Long Description: Storage Tank
Horizontal Accuracy Measure: 52
Horizontal Reference Datum Name: North American Datum of 1983
Source Map Scale Number:

Owner or Operator

Operator Name: Daisy Brand, LLC
Operator Phone: (520) 723-2500

Mailing Address

Operator Street 1: 752 West Ash Avenue
Operator Street 2:
Operator City: Casa Grande
Operator State: ARIZONA
Operator ZIP: 85222
Operator ZIP4:
Operator Foreign State or Province:
Operator Foreign ZIP:
Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person: Edward Noeth
RMP Title of Person or Position: Maintenance Supervisor
RMP E-mail Address: ENoeth@daisybrand.com

Emergency Contact

Emergency Contact Name: Edward Noeth
Emergency Contact Title: Maintenance Supervisor
Emergency Contact Phone: (520) 723-2515
Emergency Contact 24-Hour Phone: (520) 431-2443
Emergency Contact Ext. or PIN:
Emergency Contact E-mail Address: ENoeth@daisybrand.com

Other Points of Contact

Facility or Parent Company E-mail Address:
Facility Public Contact Phone:
Facility or Parent Company WWW Homepage
Address:

Local Emergency Planning Committee

LEPC: Pinal County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site: 53
FTE Claimed as CBI:

Covered By

OSHA PSM : Yes
EPCRA 302 : Yes
CAA Title V:

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External Agency:

Fire Department

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:

Ammonia Safety Management, Inc.

Preparer Phone:

(770) 992-6116

Preparer Street 1:

1104 Macy Drive

Preparer Street 2:

Preparer City:

Roswell

Preparer State:

GEORGIA

Preparer ZIP:

30076

Preparer ZIP4:

Preparer Foreign State:

Preparer Foreign Country:

Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided:

Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:

See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:

1000015766

Description:

Refrigeration System

Process Chemical ID:

1000018570

Program Level:

Program Level 3 process

Chemical Name:

Ammonia (anhydrous)

CAS Number:

7664-41-7

Quantity (lbs):

18937

CBI Claimed:

Flammable/Toxic:

Toxic

Process NAICS

Process ID:	1000015766
Process NAICS ID:	1000016148
Program Level:	Program Level 3 process
NAICS Code:	31151
NAICS Description:	Dairy Product (except Frozen) Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000012637

Percent Weight:

Physical State:

Model Used:

Release Duration (mins):

Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

Gas liquified by pressure

EPA's RMP Guidance for Ammonia Refrigeration
Reference Tables or Equations

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1.5

F

Rural

Passive Mitigation Considered

Dikes:

Enclosures:

Berms:

Drains:

Sumps:

Other Type:

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000013886

Percent Weight:

Physical State:

Model Used:

Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

Gas liquified by pressure

EPA's RMP Guidance for Ammonia Refrigeration
Reference Tables or Equations

3.0

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Rural

Passive Mitigation Considered

Dikes:

Enclosures:

Berms:

Drains:

Sumps:

Other Type:

Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Neutralization:

Excess Flow Valve:

Flares:

Scrubbers:

Emergency Shutdown:

Other Type:

Yes

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000015451
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7

Prevention Program Level 3 ID:	1000012939
NAICS Code:	31151

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	16-Dec-2009
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Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	01-Apr-2008
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The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	Yes

Tornado:	Yes
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	Yes
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Yes

Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):

16-Dec-2009

Training

Training Revision Date (The date of the most recent review or revision of training programs):

16-Dec-2009

The Type of Training Provided

Classroom:

On the Job:

Yes

Other Training:

The Type of Competency Testing Used

Written Tests:

Oral Tests:

Demonstration:

Yes

Observation:

Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):

16-Dec-2009

Equipment Inspection Date (The date of the most recent equipment inspection or test):

16-Dec-2009

Equipment Tested (Equipment most recently inspected or tested):

Engine Room Equipment

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):

20-Aug-2009

Change Management Revision Date (The date of the most recent review or revision of management of change procedures):

16-Dec-2009

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):

Compliance Audit Change Completion Date
(Expected or actual date of completion of all changes resulting from the compliance audit):

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 16-Dec-2009

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 16-Dec-2009

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 16-Dec-2009

Contractor Safety Performance Evaluation Date
(The date of the most recent review or revision of contractor safety performance):

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?):

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Healthcare (Does facility's ER plan include information on emergency health care?):

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Cara Grande Fire Department

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (520) 421-8777

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify):

Executive Summary

Executive Summary

Stationary Source and the Regulated Substances Handled

Daisy Brand, LLC is a manufacturer of sour cream. Anhydrous ammonia is the only regulated substance present at the Casa Grande facility. The entire ammonia inventory is attributed to its use as a refrigerant.

Accidental Release Prevention and Emergency Response Policies

Daisy Brand, LLC is committed to employee, public and environmental safety. Our comprehensive accidental release prevention program that covers areas such as design, installation, operating procedures, and maintenance demonstrates this commitment, and employee training associated with the processes at our facility. It is our policy to implement appropriate controls to prevent possible releases of regulated substances.

Worst Case Release Scenario and the Alternative Release Scenario

Worst case and alternate release scenarios were developed using the methodology given in the EPA's Risk Management Program Guidance for Ammonia Refrigeration. The details of the chosen scenarios are located within the Risk Management Program that is located on site.

Accidental Release Prevention and the Chemical-Specific Prevention Program

Daisy Brand, LLC has taken all the necessary steps to comply with the accidental release prevention requirements set out under 40 CFR Part 68 of the EPA. In addition, our facility is subject to the OSHA PSM standard under 29 CFR 1910.119. The following sections briefly describe the elements of the release prevention program that is in place at our stationary source.

Process Safety Information

Daisy Brand, LLC currently maintains a detailed record of written process safety information that describes the chemical hazards, operating parameters and equipment designs associated with all the processes.

Process Hazard Analysis

The methodology used to carry out the analysis is What If Analysis. The analyses are undertaken by a team of qualified personnel with expertise in engineering and process operations and are revalidated at a regular interval of 5 years. Any findings related to the hazard analysis are addressed in a timely manner.

Operating Procedures

For the purposes of safely conducting activities within our covered process, Daisy Brand, LLC maintains written operating procedures. These procedures address various modes of operation such as initial startup, normal operations, temporary operations, emergency shutdown, emergency operations, normal shutdown and startup after a turnaround. The information is reviewed and is readily accessible to operators involved with the process.

Training

Daisy Brand, LLC has a training program in place to train employees who are operating the process or are associated with the process. Refresher training will be provided at least every three (3) years and more frequently as needed.

Mechanical Integrity

Daisy Brand, LLC conducts documented maintenance checks on process equipment to ensure proper operations. Process equipment examined by these checks includes pressure vessels, storage tanks, piping systems, reliefs and ventilation systems, emergency shutdown systems, control and compressors. Maintenance procedures are performed by qualified personnel with a background in maintenance practices. Training is provided to the personnel as needed. Any equipment deficiencies identified during maintenance checks are corrected in a safe and timely manner.

Management of Change

Written procedures are in place at Daisy Brand, LLC to manage changes in process chemicals, technology, equipment and procedures. Process operators, maintenance personnel and all other employees whose job tasks are affected by a change in a process are promptly made aware of and offered training to deal with the changes.

Pre-startup Reviews

Pre-start up safety reviews related to new processes and to modifications in the established process are conducted as a regular practice at Daisy Brand, LLC. These reviews are conducted to confirm that construction, equipment, operating and maintenance procedures are suitable for safe startup prior to placing equipment into operation.

Compliance Audits

Daisy Brand, LLC conducts audits on a regular basis to determine whether the provisions set out under the RMP Rule are being implemented. These audits are carried out at least every 3 years and any corrective actions required as a result of the audits are undertaken in a safe and prompt manner.

Incident Investigation

Daisy Brand, LLC promptly investigates incidents that could reasonably result in a catastrophic release of a regulated substance. These investigations are undertaken to identify the situation leading to the incident as well as any corrective actions to prevent the release from reoccurring. All reports are retained for a minimum of 5 years.

Employee Participation

Daisy Brand, LLC believes that process safety management and accident prevention is a team effort. Company employees are encouraged to express their views concerning accident prevention issues and to recommend improvements. In addition, our employees have access to all information collected as part of the facility's compliance with the RMP Rule including information resulting from process hazard analyses.

Contractors

On occasion, our company hires contractors to conduct specialized maintenance and construction activities. Prior to selecting a contractor, a thorough evaluation of safety performance of the contractor is carried out. Daisy Brand, LLC has a policy of informing the contractors of known potential hazards related the contractor's work and the processes. Contractors are also informed of all applicable procedures for emergency response to an accidental release of a regulated substance.

Five-year Accident History

Daisy Brand, LLC has an excellent record of preventing accidental releases over the last 5 years. With continued attention to maintenance and operations, this exemplary record is expected to continue.

Emergency Response Plan

Daisy Brand, LLC has a written emergency action plan to deal with accidental releases of hazardous materials. The plan includes all aspects of emergency action plan including evacuations and notification of local emergency response agencies and the public

Planned Changes to Improve Safety

Several developments and findings have resulted from the implementation of the various elements of our accidental release prevention program. Continued training, and program reviews are some of the major steps we want to take to improve safety at our facility.